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November 15, 2010

Air Resources Board
Attention Ms. Lori Andreoni
Manager, Board Administration and Regulations Coordination Unit
1001 I Street, 23rd Floor
Sacramento CA 95814

Dear Board Members:

Subject: Comments on Proposed Amendments to the California Consumer Products Regulations – Board Agenda Item # 10-10-7

S. C. Johnson & Son, Inc. (SCJ) wishes to comment on amendments to California's Consumer Products Regulations currently before the Air Resources Board for approval.

SCJ is a global manufacturer and marketer of household consumer products. Our brands in the United States include Pledge® furniture maintenance products, Scrubbing Bubbles® and fantastik® general purpose cleaners, Windex® glass cleaners, and Raid® insect control products. Products under each of these brands will be affected by the proposed amendments being considered by the Board on November 18, 2010.

SCJ appreciates the extensive outreach to industry undertaken by ARB staff during development of these amendments. Staff has contacted SCJ and others in industry and sought to understand the technical and commercial implications of its regulations on product performance. In particular, SCJ wishes to acknowledge staff's consideration of public health, technical and registration issues relating to the Flying Bug Insecticide category, and its willingness to modify its initial proposal.

While the new VOC limits in SCJ categories will require reformulation of some existing products, SCJ does not oppose the new consumer product VOC limits being considered for adoption in these cases. SCJ would ask, however, that ARB continue its existing practice of seeking industry comment at a reasonable time in the future and, if necessary, conducting a technical review before the effective date of new limits.

Sincerely,



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c: Janette Brooks, Chief-Air Quality Measures Branch